

21 U.S.C. § 841(a)(1)

COUNT TWO
(Possession of a Firearm by a Prohibited Person)

The United States Attorney for the District of Maryland further charges that:

On or about December 15, 2021, in the District of Maryland, the Defendant,

JERMAINE STEWARD,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm: to wit, Ruger Security-9 9mm handgun, serial #384-5854; and the Defendant's possession thereof was in and affecting commerce.

18 U.S.C. § 922(g)(1)

FORFEITURE

The United States Attorney for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction.

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Count One, the Defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

Firearms and Ammunition Forfeiture

3. Pursuant to 18 U.S.C. § 924(d), upon conviction of the offense alleged in Count Two the Defendant convicted of the offense shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in those offense(s).

Substitute Assets

4. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the property charged with forfeiture in the paragraphs above.

Property Subject to Forfeiture

- 4. The property to be forfeited includes, but is not limited to, the following:
 - a. Approximately \$1,411 seized from 6325 Monika Place, Apt 507, Woodlawn, MD on December 15, 2021 (Asset ID: 22-DEA-686899);
 - b. Cugir (CAI) Draco 7.62 x 39mm serial #PMD-20680-20;
 - c. Kel-Tec Sub2000 rifle;
 - d. Taurus G2C 9mm handgun;
 - e. 1911.45 ACP Magazine containing approximately one round of .45 caliber ammunition;
 - f. Approximately one round of 9mm ammunition;
 - g. One firearm barrel; and
 - h. One Ruger Security-9 9mm handgun, serial #384-5854.

Erek L. Barron *Joan Castleton Mathias*

Erek L. Barron
United States Attorney

Digitally signed by
JOAN MATHIAS
Date: 2023.03.02
14:51:20 -05'00'

March 2, 2023

Date